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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA)	
)	
Plaintiff)	
)	
vs)	Case No: 1:23-cr-00031-ABJ
)	
CHRISTOPHER BAKER)	
)	
Defendant)	

**STIPULATED MOTION TO EXTEND DEFENDANT’S EXPERT DESIGNATION
DEADLINE**

COMES NOW, the Defendant, by and through his counsel, Mark C. Hardee, and in his
Stipulated Motion to Extend Defendant’s Expert Designation Deadline does allege and state:

1. The Defendant has been indicted for violations of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), Distribution of Fentanyl Resulting in Death, Distribution of Fentanyl Resulting in Serious Bodily Injury, and Distribution of Fentanyl.
2. This Court entered a discovery order regulating discovery in this case on March 21, 2023. (ECF No. 34). It directed the Defendant to designate experts “no later than twenty-one (21) days prior to trial,” which resulted in an expert designation deadline of May 1, 2023.
3. This Court entered an Order granting Joint Motion to Continue Trial Date Beyond Speedy Trial Calculations and to Declare Case “Unusual and Complex.” (ECF No. 43). It directed the Defendant to designate experts “no later than twenty-one (21) days prior to trial,” which resulted in an expert designation deadline of July 31, 2023.
4. That Counsel for the Defendant anticipates designating a Forensic Pathologist who will testify at trial as to various issues which are necessary in the defense. At this time, due

to voluminous discovery including multiple video recording, interviews, and lab reports the defense has not had adequate time to review the evidence recently provided and establish the necessary experts for a proper defense.

5. That Counsel requests an additional week to permit time to review reports and designate the necessary experts needed for a proper defense.

6. Prior to filing this motion, Counsel conferred with AUSA, Kerry Jacobson, and she represented she does not oppose the motion.

DATED this 21st day of July, 2023.

CHRISTOPHER BAKER

BY

/s/ Mark C. Hardee
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CERTIFICATE OF SERVICE

I Mark C. Hardee certify that a true and correct copy of the foregoing Motion has been forwarded to Kerry Jacobson, Asst U.S. Attorney, via electronic filing, on this 21st day of July, 2023.

/s/ Mark C. Hardee
Mark C. Hardee